

May 30, 2025

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VIA ECF

The Hon. Rukhsanah L. Singh
United States Magistrate Judge
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Room 2020
Trenton, NJ 08608

Re: In re: Insulin Pricing Litigation, 2:23-md-03080-BRM-RLS (D.N.J.) – Privilege Log Protocol Briefing Schedule

Dear Judge Singh:

This firm represents the Express Scripts Defendants in this matter. We write on behalf of all parties to request the entry of an agreed schedule for the briefing of the parties' remaining disputes regarding the entry of a Privilege Log Protocol. The parties have conferred numerous times regarding the terms of such a protocol, but have been unable to reach agreement.

The parties therefore request the Court's assistance to resolve the remaining disputes regarding a Privilege Log Protocol. The parties have agreed to the following simultaneous briefing schedule to submit the dispute to the Court:

- Plaintiffs and Defendants each file an omnibus opening letter brief on May 7, 2025 at 5:00 p.m. EST
- State Attorney General Track will file a separate opening letter brief to address protocol provisions specific to State Attorney General documents on May 7, 2025 at 5:00 p.m. EST
- Plaintiffs and Defendants each file a reply letter brief on May 16, 2025 at 5:00 p.m. EST

Should Your Honor find this proposal acceptable, we respectfully request the letter be "So Ordered" and entered on the docket.

We appreciate the Court's consideration of this submission and ongoing attention to this matter.

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Respectfully submitted,

/s/ Jason R. Scherr

Jason R. Scherr

cc: Counsel of Record (via ECF)

IT IS on this ____ day of _____, 2025,
SO ORDERED

Hon. Rukhsanah Singh, U.S.M.J.